

1980453-04

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
LAREDO DIVISION**

**LAS PLAZAS OF SAUNDERS LTD, and
LAS PLAZAS OF LAREDO INC.**

Plaintiffs,

V.

**TRAVELERS CASUALTY INSURANCE
COMPANY OF AMERICA**

Defendant

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Civil Action No. 5:20-CV-00072

INDEX OF STATE COURT MATERIALS

No.	Date Filed or Entered	Document
A		Docket Sheet
A-1	03/23/20	Plaintiff's Original Petition
A-2	04/21/20	Defendant's Original Answer
A-3	04/21/20	Defendant's Jury Demand
A-4	05/01/20	Defendant's Notice of Filing Notice of Removal

EXHIBIT “A”

Case Information

LAS PLAZAS OF SAUNDERS LTD,LAS PLAZAS OF LAREDO INC.VS.TRAVELERS CASUALTY INSURANCE COMPANY OF AMERICA

2020CVH000625D1

Location	Case Category	Case Type	Case Filed Date
Webb County - 49th District Court	Civil - Contract	Debt/Contract - Consumer/DTPA	3/23/2020
Judge			
Lopez, Jose A.			

Parties ³

Type	Name	Attorneys
Plaintiff	LAS PLAZAS OF SAUNDERS LTD	VINCENZO J SANTANI
Plaintiff	LAS PLAZAS OF LAREDO INC.	VINCENZO J SANTANI
Defendant	TRAVELERS CASUALTY INSURANCE COMPANY OF AMERICA	ROBERT F SCHEIHING

Filings ³

Date	Filing Type	Description	Documents
3/23/2020	Petition	PLAINTIFF'S ORIGINAL PETITION	3-23-2020-POP-Las Plazas-2333 Saunders .pdf
4/21/2020	Jury Demand	DEMAND FOR JURY PAID FOR BY ATTORNEY ROBERT SCHEIHING	1980453 Jury Demand.pdf
4/21/2020	Answer/Response	DEFENDANT'S ORIGINAL ANSWER	1980453 Answer.pdf

EXHIBIT “A-1”

SERVE

2020CVH000625D1

CITATION

**THE STATE OF TEXAS
COUNTY OF WEBB**

NOTICE TO THE DEFENDANT: "YOU HAVE BEEN SUED. YOU MAY EMPLOY AN ATTORNEY. IF YOU OR YOUR ATTORNEY DO NOT FILE A WRITTEN ANSWER WITH THE CLERK WHO ISSUED THIS CITATION BY 10:00 A.M. ON THE MONDAY NEXT FOLLOWING THE EXPIRATION OF TWENTY DAYS AFTER YOU WERE SERVED THIS CITATION AND PETITION, A DEFAULT JUDGMENT MAY BE TAKEN AGAINST YOU."

**TO: TRAVELERS CASUALTY INSURANCE COMPANY OF AMERICA
211 EAST 7TH STREET, SUITE 620
AUSTIN, TX 78701-3218**

DEFENDANT, IN THE HEREINAFTER STYLED AND NUMBERED CAUSE, YOU ARE HEREBY COMMANDED TO APPEAR BEFORE THE 49th District Court of Webb County, Texas, to be held at the said courthouse of said county in the city of Laredo, Webb County, Texas, by filing a written answer to the Petition of Plaintiff at or before 10:00 O'CLOCK A.M. of the Monday next after the expiration of 20 days after the date of service thereof, a copy of which accompanies this citation, in the Cause #: 2020CVH000625D1, styled:

**LAS PLAZAS OF SAUNDERS LTD; LAS PLAZAS OF LAREDO INC., PLAINTIFFS
VS.**

TRAVELERS CASUALTY INSURANCE COMPANY OF AMERICA, DEFENDANT
Said Plaintiff's Petition was filed on 03/23/2020 in said court by:

**VINCENZO J SANTANI, ATTORNEY FOR PLAINTIFFS
26619 INTERSTATE 45 SOUTH
THE WOODLANDS TX 77380**

WITNESS ESTHER DEGOLLADO, DISTRICT CLERK OF WEBB COUNTY, TEXAS,
Issued and given under my hand and seal of said court at office,
on this the 27th day of March, 2020.

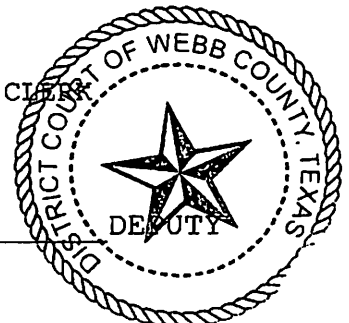
C L E R K O F C O U R T

**CALENDAR CALL SET FOR
6/2/2020 AT 1:30 PM**

**ESTHER DEGOLLADO
WEBB COUNTY DISTRICT CLERK
P.O. BOX 667
LAREDO, TX 78042**

BY:

Maribel Vela
Maribel Vela



RETURN

2020CVH000625D1

OFFICER'S RETURN

Came to hand on the 7 day of April, 2020 at
9 O'CLOCK A.M. Executed at
 _____, within the COUNTY of _____
 at _____ O'CLOCK _____ .M. on the _____ day of
 _____, 2020, by delivering to the within named
TRAVELERS CASUALTY INSURANCE COMPANY OF AMERICA, each, in
 person, a true copy of this citation together with the
 accompanying copy of the petition, having first attached such
 copy of such petition to such copy of citation and endorsed on
 such copy of citation the date of delivery.

The distance actually travelled by me in serving such process
 was _____ miles, and my fees are as follows:

Total Fee for serving this citation \$ _____.

To certify which, witness my hand officially.

 SHERIFF, CONSTABLE

 COUNTY, TEXAS

BY _____
 DEPUTY

THE STATE OF TEXAS }
 COUNTY OF WEBB }

Before me, the undersigned authority, on this day personally
 appeared _____, who after being duly
 sworn, upon oath said that a notice, of which the above is a
 true copy, was by him/her delivered to

_____ on the
 _____ day of _____, _____.

SWORN TO AND SUBSCRIBED BEFORE ME on the _____ day of
 _____, _____, to certify which witness my hand and
 seal of office.

 NOTARY PUBLIC
 MY COMMISSION EXPIRES

Filed
3/23/2020 12:40 PM
Esther Degollado
District Clerk
Webb District
Diana Vela
2020CVH000625D1

CAUSE NO 2020CVH000625D1

LAS PLAZAS OF SAUNDERS LTD,	§	IN THE DISTRICT COURT
LAS PLAZAS OF LAREDO INC.	§	
Plaintiff,	§	
	§	
	§	
v.	§	WEBB COUNTY, TEXAS
	§	
TRAVELERS CASUALTY	§	
INSURANCE COMPANY	§	
OF AMERICA,	§	
Defendant.	§	<u>47th</u> JUDICIAL DISTRICT

PLAINTIFF'S ORIGINAL PETITION

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Las Plazas of Saunders Ltd., Las Plazas of Laredo Inc. (hereinafter "Plaintiffs"), and complains of Travelers Casualty Insurance Company of America (hereinafter "Defendant"). In support of its claims and causes of action, Plaintiffs would respectfully show the Court as follows:

**I.
DISCOVERY LEVEL**

1. Plaintiffs intend for discovery to be conducted at Level 2, pursuant to Rule 190 of the Texas Rules of Civil Procedure.

**II.
JURISDICTION AND VENUE**

2. This Court has jurisdiction to hear Plaintiffs' claims under Texas common law and Texas statutory law. Inarguably, the amount in controversy exceeds the minimum jurisdictional limits of this Court. Additionally, Venue is mandatory and proper in Webb County, Texas, in

accordance with Tex. Civ. Prac. & Rem. Code § 15.002, as all or a substantial part of the events giving rise to this suit occurred within this county.

III.
PARTIES

3. Plaintiffs are individuals whose business and property is located in Laredo, Webb County, Texas.

4. Defendant is a foreign corporation, duly registered with the Texas Department of Insurance to do business in Texas, which may be served with process by serving this Original Petition and a copy of the citation at its registered address, 211 East 7th Street, Suite 620, Austin, Texas 78701-3218.

IV.
FACTUAL BACKGROUND

5. Plaintiffs are named insureds under a commercial property insurance policy issued by Defendant under Policy Number 680-2H506173 (hereinafter referred to as the “Policy”).

6. On or about March 27, 2018, a storm hit the Webb area and Plaintiffs’ property with five buildings located at 2333 Saunders, Laredo, Texas 78041 (hereinafter referred to as the “Property”), causing wind and hail damage. Pursuant to the obligations under the Policy, Plaintiffs timely filed an insurance claim. Since the Property has five buildings, Defendant assigned five different claims for the same Property.

7. Subsequently, Defendant underpaid Plaintiffs’ claim(s).

8. Defendant failed to make a good-faith effort to objectively investigate Plaintiffs’ claim(s). Instead, Defendant engaged in an outcome-oriented investigation designed to deny

Plaintiffs' claim(s). As such, Defendant conducted a substandard investigation of the Property and damages, prepared a report that failed to include all of the damages that were observed during the inspection, misclassified the damages identified during the inspection, and misrepresented its findings to Plaintiffs.

9. More specifically, upon acceptance of the claim(s) by Defendant, Defendant hired adjusting firm, who deployed Russ Denton to perform an inspection of the Property and Plaintiffs' damages. On April 9, 2018 through April 10, 2018, Russ Denton discovered covered functional damage, including but not limited to photographs of hail indentations, bruising, and impact damage to the low sloped built up roofing system and metal roofing system, metal appurtenances, air conditioning units, and other collateral damage to awnings, windows, and lamp posts, as well as tiled roofing sections. Mr. Denton also photographed wind damage such as cuts, gouges, and scrapes to the roofing systems.

10. After Defendant's liability under the Policy became reasonably clear or should have become reasonably clear, Defendant undervalued Plaintiffs' damages rendering net estimate of \$10,749.06.

11. In an effort of performing its due diligence, Plaintiffs sought an additional and competent opinion from Gulf Coast Estimators. Gulf Coast Estimators found covered damage to Property and found the total amount to perform proper repair/replacement to the Property was \$1,381,376.18, not \$10,749.06, as Defendant represented.

12. It is clear that Defendant's unreasonable and outcome-oriented investigation was the cause of Plaintiffs' mishandled claim(s).

13. Further, Defendant's performance of this results-based investigation of Plaintiffs' claim(s), led directly to a biased, unfair and inequitable evaluation of Plaintiffs' losses to the Property under all areas of coverage.

14. As a result of the above issues, Plaintiffs did not receive the coverage for which it had originally contracted with Defendant. Therefore, Plaintiffs have been forced to file this suit in order to recover damages arising from the above-referenced conduct and from the unfair refusal to pay insurance benefits in accordance with the Policy's terms.

15. As indicated below, Plaintiffs seek relief under the common law, the Deceptive Trade Practices-Consumer Protection Act and the Texas Insurance Code.

V.

CLAIMS AGAINST DEFENDANT

16. Plaintiffs hereby incorporates by reference all facts and circumstances set forth under the foregoing paragraphs.

17. All conditions precedent to recovery by Plaintiffs have been met or have occurred.

18. All acts by Defendant were undertaken and completed by its officers, agents, servants, employees, and/or representatives. Such were either done with the full authorization or ratification of Defendant and were completed in its normal and routine course and scope of employment with Defendant.

1. BREACH OF CONTRACT

19. According to the policy that Plaintiffs purchased, Defendant had the absolute duty to reasonably investigate Plaintiffs' damages, and to properly pay Plaintiffs' policy benefits for the claims made due to the extensive storm-related damages.

20. As a result of the storm-related event, Plaintiffs suffered extreme external and internal damages.

21. Despite objective evidence of such damages, Defendant has breached its contractual obligations under the subject insurance policy by failing to pay Plaintiffs benefits relating to the cost to properly repair Plaintiffs' Property, as well as for related losses. As a result of this breach, Plaintiffs have suffered actual and consequential damages.

2. VIOLATIONS OF THE TEXAS DTPA AND TIE-IN-STATUTES

22. Defendant's collective actions constitute violations of the Texas Deceptive Trade Practices Act, including but not limited to, Sections 17.46(b)(5), (7), (12), (24), and Sections 17.50(a)(3), (4) of the Texas Business & Commerce Code. Specifically in violation of Section 17.46(b), Defendant collectively engaged in false, misleading, or deceptive acts or practices that included, but were not limited to:

17.46(b)(5) - Representing that goods or services have sponsorship, approval, characteristics, ingredients, uses, benefits or quantities which they do not have or that a person has a sponsorship, approval, status, affiliation, or connection which the person does not;

17.46(b)(7) - Representing that goods or services are of a particular standard, quality, or grade, or that good are of a particular style or model, if they are of another;

17.46(b)(12) - Representing that an agreement confers or involves rights, remedies, or obligations which it does not have or involve, or which are prohibited by law; and

17.46(b)(24) - Failing to disclose information concerning goods or services which was known at the time of the transaction if such failure to disclose such information was intended to induce the consumer into a transaction into which the consumer would not have entered had the information been disclosed.

23. Moreover, and specifically in violation of Section 17.50(a), Defendant collectively engaged in the use of false, misleading and deceptive acts or practices outlined above, to which Plaintiffs relied on to its detriment, in addition to engaging in the following:

17.50(a)(3) - An unconscionable action or course of action; and

17.50(a)(4) - Violating Chapter 541 of the Texas Insurance Code.

24. As described in this Original Petition, Defendant represented to Plaintiffs that the Policy and Defendant's adjusting and investigative services had characteristics or benefits that it actually did not have, which gives Plaintiffs the right to recover under Section 17.46(b)(5) of the DTPA.

25. As described in this Original Petition, Defendant represented to Plaintiffs that the Policy and Defendant's adjusting and investigative services were of a particular standard, quality, or grade when they were of another, which also stands in violation of Section 17.46(b)(7) of the DTPA.

26. By representing that Defendant would pay the entire amount needed by Plaintiffs to repair the damages caused by the storm event and then not doing so, Defendant has violated Sections 17.46(b)(5), (7), (12), (24) and 17.50(a)(3) - (4) of the DTPA.

27. Defendant's actions, as described herein, are unconscionable in that it took advantage of Plaintiffs' lack of knowledge, ability, and experience to a grossly unfair degree. Defendant's unconscionable conduct gives Plaintiffs the right to relief under Section 17.50(a)(3) of the DTPA.

28. Defendant's conduct, acts, omissions, and failures, as described in this Original Petition, are violations of Chapter 541 of the Texas Insurance Code and are unfair practices in the business of insurance in violation of Section 17.50(a)(4) of the DTPA.

29. Plaintiffs are consumers, as defined under the DTPA, who purchased insurance products and services from Defendant. Plaintiffs relied upon the foregoing false, misleading, and deceptive acts or practices conducted by Defendant to its detriment. As a direct and proximate result of Defendant's collective acts and conduct, Plaintiffs have been damaged in an amount in excess of the minimum jurisdictional limits of this Court, for which Plaintiffs now sue. All of the above-described acts, omissions, and failures of Defendant are a producing cause of Plaintiffs' damages that are described in this Original Petition.

30. Since Defendant's collective actions and conduct were committed knowingly and intentionally, Plaintiffs are entitled to recover, in addition to all damages described herein, mental anguish damages and additional penalty damages, in an amount not to exceed three times such actual damages, for Defendant having knowingly committed its conduct. Additionally, Plaintiffs are ultimately entitled to recover damages in an amount not to exceed three times the amount of mental anguish and actual damages due to Defendant having intentionally committed such conduct.

31. As a result of Defendant's unconscionable, misleading, and deceptive actions and conduct, Plaintiffs have been forced to retain the legal services of the undersigned attorneys to protect and pursue these claims on its behalf. Accordingly, Plaintiffs also seek to recover its costs and reasonable and necessary attorneys' fees as permitted under Section 17.50(d) of the

Texas Business & Commerce Code, as well as any other such damages to which Plaintiffs may show themselves to be justly entitled at law and in equity.

3. VIOLATIONS OF TEXAS INSURANCE CODE

A. CHAPTER 541

32. Defendant's actions constitute numerous violations of the Texas Insurance Code, including Sections 541.051, 541.060(a) and 541.061. Under, Section 541.051, it is an unfair and deceptive act or practice in the business of insurance to:

541.051(1)(A) - Making statements misrepresenting the terms of the policy; and

541.051(1)(B) - Making statements misrepresenting the benefits of the policy.

33. Continuing, in violation of Section 541.060(a), Defendant engaged in certain unfair settlement practices with respect to a claim by an insured that include the following:

541.060(a)(1) - Misrepresenting a material fact or policy provision relating to coverage;

541.060(a)(2)(A) - Failing to make prompt, fair, and equitable settlement of a claim after the insurer's liability is established;

541.060(a)(2)(B) - Failing to promptly and fairly settle a claim under one portion of a policy in order to influence the claimant to settle an additional claim under another portion of the coverage;

541.060(a)(3) - Failing to promptly provide a reasonable explanation of the basis for denial of a claim or for the offer of a compromise settlement;

541.060(a)(4)(A) - Failing to affirm or deny coverage of a claim or to submit a reservation of rights within reasonable time;

541.060(a)(4)(B) - Failing to submit a reservation of rights to a policyholder;

541.060(a)(5) - Refusing, failing, or delaying an offer of settlement under applicable first-party coverage on the basis that other coverage may be available or that other parties may be liable for damages, unless specifically provided in the policy; and

541.060(a)(7) - Refusing to pay a claim without conducting a reasonable investigation of the details of the claim.

34. Further, Defendant violated Section 541.061 of the Texas Insurance Code, by committing unfair and deceptive acts or practices in the business of insurance to misrepresent an insurance policy by:

541.061(1) - Making an untrue statement of material fact;

541.061(2) - Failing to state a material fact necessary to make other statements made not misleading, considering the circumstances under which the statements were made;

541.061(3) - Making a statement in a manner that would mislead a reasonably prudent person to a false conclusion of a material fact; and

541.061(5) - Failing to disclose a matter required by law to be disclosed, including failing to make a disclosure in accordance with another provision of this code.

B. CHAPTER 542

35. Defendant's actions constitute numerous violations of Chapter 542 of the Texas Insurance Code, including but not limited to, Sections 542.003 and 542.055 - 542.060. Section 542.003 of the Texas Insurance Code expressly prohibits certain unfair settlement practices as they relate to claims by insured parties of insurance policies. Based upon the conduct of Defendant to date, Defendant has thus far committed the following prohibited practices:

542.003(b)(1) - Knowingly misrepresenting to a claimant pertinent facts or policy provisions relating to coverage at issue;

542.003(b)(2) - Failing to acknowledge with reasonable promptness pertinent communications relating to a claim arising under the insurer's policy;

542.003(b)(3) - Failing to adopt and implement reasonable standards for the prompt investigation of claims arising under the insurer's policies;

542.003(b)(4) - Not attempting in good faith to effect a prompt, fair, and equitable settlement of a claim submitted in which liability has become reasonably clear; and

542.003(b)(5) - Compelling a policyholder to institute a suit to recover an amount due under a policy by offering substantially less than the amount ultimately recovered in a suit brought by the policyholder.

36. Defendant has violated Sections 542.055 - 542.058 of Chapter 542 of the Texas Insurance Code in its failure to adhere to the statutorily-prescribed deadlines in the handling, adjustment and payment of insurance claims. More specifically, Defendant committed the following violations:

542.055(a)(3) - Failing to request from the Plaintiff all items, statements, and forms that Defendant reasonably believes, at the time, was required from Plaintiff, within 15 days after Defendant received notice of Plaintiffs' claim(s);

542.056(a) - Failing to notify Plaintiffs in writing of acceptance or rejection of a claim not later than the 15th business day after the date Defendant received all items, statements, and forms required for Defendant to secure final proof of loss; and

542.058(a) - Failing to, after receiving all items, statements, and forms reasonably requested and required under Section 542.055, Defendant delayed payment of the claim for a period exceeding the period more than 60 days.

37. As a result of the above-referenced violations and acts committed by Defendant, and in accordance with Section 542.060 of the Texas Insurance Code, Defendant is liable to pay Plaintiffs, in addition to the amount of the claim(s), simple interest on the amount of the claim(s) as damages each year at the rate determined on the date of judgment by adding five percent to the interest rate determined under Section 304.003, Finance Code, together with reasonable and necessary attorney's fees. Plaintiffs are also entitled to prejudgment interest on the amount of the

claim(s), as provided by law. Interest awarded under this subsection as damages accrues beginning on the date the claim(s) were required to be paid.

38. Since a violation of the Chapter 541 of the Texas Insurance Code is a direct violation of the DTPA, and because Defendant's actions and conduct were committed knowingly and intentionally, Plaintiffs are entitled to recover, in addition to all damages described herein, mental anguish damages and additional damages in an amount not to exceed three times the amount of actual damages, for Defendant having knowingly committed such conduct.

39. Additionally, Plaintiffs are entitled to recover damages in an amount not to exceed three times the amount of mental and actual damages for Defendant having intentionally committed such conduct.

40. As a result of Defendant's Texas Insurance Code violations, Plaintiffs have been forced to retain the legal services of the undersigned attorneys to protect and pursue these claims on its behalf. Accordingly, Plaintiffs also seek to recover its court costs, reasonable and necessary attorneys' fees as permitted under Section 17.50(d) of the Texas Business & Commerce Code or Section 541.152 of the Texas Insurance Code and any other such damages to which Plaintiffs may show themselves justly entitled by law and in equity.

4. BREACH OF THE COMMON LAW DUTY OF GOOD FAITH AND FAIR DEALING

41. Defendant has breached its common law duty of good faith and fair dealing by denying Plaintiffs' claim(s) based upon a biased investigation intended to construct a pretextual basis for denial. Defendant failed to make a good-faith effort to objectively investigate

Plaintiffs' claim(s), by engaging in an outcome-oriented investigation designed to misclassify covered damage as not covered. Defendant also breached its common law duty of good faith and fair dealing by denying Plaintiffs' claim(s) when Defendant's liability had become reasonably clear. Defendant also acted in bad faith by underpaying Plaintiffs' claim(s) inadequately adjusting Plaintiffs' claim(s) and failing to conduct a reasonable investigation to determine whether there was a reasonable basis for Defendant's coverage decision.

42. Plaintiffs further allege that because Defendant's bad faith was accompanied by malicious, intentional, fraudulent, or grossly negligent conduct for which the law allows the imposition of exemplary damages.

VI. WAIVER AND ESTOPPEL

43. Plaintiffs hereby incorporate by reference all facts and circumstances set forth under the foregoing paragraphs.

44. Defendant has waived and is estopped from asserting any defenses, conditions, exclusions, or exceptions to coverage not contained in any Reservation of Rights or denial letters to Plaintiffs.

VII. DAMAGES

45. Defendant's acts have been the producing and/or proximate cause of damage to Plaintiffs, and Plaintiffs seek an amount in excess of the minimum jurisdictional limits of this Court.

46. More specifically, Plaintiffs seek monetary relief of over \$1,000,000 including damages of any kind, penalties, costs, expenses, pre-judgment interest, and attorney fees.

47. Furthermore, Defendant's conduct was committed knowingly and intentionally. Accordingly, Defendant is liable for additional damages under Section 17.50(b)(1) of the DTPA, as well as all operative provisions of the Texas Insurance Code. Plaintiffs are thus, clearly entitled to statutory penalty interest damages allowed by Section 542.060 of the Texas Insurance Code.

VIII.
ATTORNEY FEES

48. In addition, Plaintiffs are entitled to all reasonable and necessary attorneys' fees pursuant to the Texas Insurance Code, DTPA, and sections 38.001-.005 of the Civil Practice and Remedies Code.

IX.
JURY DEMAND

49. Plaintiffs demand a jury trial and tenders the appropriate fee with this Original Petition.

X.
WRITTEN DISCOVERY PROPOUNDED TO Defendant

A. REQUEST FOR DISCLOSURE Pursuant to the Texas Rules of Civil Procedure, Plaintiffs request that Defendant disclose all information and/or material as required by Rule 194.2, paragraphs (a) through (l), and to do so within 50 days of this request.

B. REQUEST FOR PRODUCTION

50. Pursuant to the Texas Rules of Civil Procedure, Plaintiffs propound the following Requests for Production.

- a. Please produce Defendant's complete claim files from the home, regional, local offices, and third party adjusters/adjusting firms regarding the claims that are the subject of this matter, including copies of the file jackets, "field" files and notes, and

drafts of documents contained in the file for the premises relating to or arising out of Plaintiffs' underlying claim(s).

- b. Please produce the CV of the individual responding to these discovery requests.
- c. Please produce the underwriting files referring or relating in any way to the policy at issue in this action, including the file folders in which the underwriting documents are kept and drafts of all documents in the file.
- d. Please produce certified copy of the insurance policy pertaining to the claims involved in this suit.
- e. Please produce the electronic diary, including the electronic and paper notes made by Defendant claims personnel, contractors, and third party adjusters/adjusting firms relating to the Plaintiffs' claims.
- f. Please produce all emails and other forms of communication by and between all parties in this matter relating to the underlying event, claims or the Property, which is the subject of this suit.
- g. Please produce the adjusting reports, estimates and appraisals prepared concerning Plaintiffs' underlying claim(s).
- h. Please produce the field notes, measurements and file maintained by the adjuster(s) and engineers who physically inspected the subject Property.
- i. Please produce the emails, instant messages and internal correspondence pertaining to Plaintiffs' underlying claim(s).
- j. Please produce the videotapes, photographs and recordings of Plaintiffs or Plaintiffs' Property, regardless of whether Defendant intends to offer these items into evidence at trial.

C. INTERROGATORIES

51. Pursuant to the Texas Rules of Civil Procedure, Plaintiffs propound the following Interrogatories.

- a. Please identify any person Defendant expects to call to testify at the time of trial.

b. Identify the individual responding to these discovery requests on behalf of Defendant, including his or her name, current occupation, and role in the Claim(s);

c. Please identify the persons involved in the investigation and handling of Plaintiffs' claims for insurance benefits arising from damage relating to the underlying event, claims or the Property, which is the subject of this suit, and include a brief description of the involvement of each person identified, their employer, and the date(s) of such involvement.

d. If Defendant or Defendant's representatives performed any investigative steps in addition to what is reflected in the claims file, please generally describe those investigative steps conducted by Defendant or any of Defendant's representatives with respect to the facts surrounding the circumstances of the subject loss. Identify the persons involved in each step.

e. Please identify by date, author, and result the estimates, appraisals, engineering, mold and other reports generated as a result of Defendant's investigation.

f. Please state the following concerning notice of claims and timing of payment:

- i. The date and manner in which Defendant received notice of the claim(s);
- ii. The date and manner in which Defendant acknowledged receipt of the claim(s);
- iii. The date and manner in which Defendant commenced investigation of the claim(s);
- iv. The date and manner in which Defendant requested from the claimant all items, statements, and forms that Defendant reasonably believed, at the time, would be required from the claimant; and
- v. The date and manner in which Defendant notified the claimants in writing of the acceptance or rejection of the claim(s).

g. Please identify by date, amount and reason, the insurance proceed payments made by Defendant, or on Defendant's behalf, to the Plaintiffs.

h. Have Plaintiffs' claims for insurance benefits been rejected or denied in full or in part? If so, state the reasons for rejecting/denying the claim(s).

i. When was the date Defendant anticipated litigation?

j. Have any documents (including those maintained electronically) relating to the investigation or handling of Plaintiffs' claims for insurance benefits been

destroyed or disposed of? If so, please identify what, when and why the document was destroyed, and describe Defendant's document retention policy.

k. Does Defendant contend that the insureds premises was damaged by storm-related events? If so, state the general factual basis for this contention.

l. Does Defendant contend that any act or omission by the Plaintiffs voided, nullified, waived or breached the insurance policy in any way? If so, state the general factual basis for this contention.

m. Does Defendant contend that the Plaintiffs failed to satisfy any condition precedent or covenant of the policy in any way? If so, state the general factual basis for this contention.

n. How is the performance of the adjuster(s) involved in handling Plaintiffs' claims evaluated? State the following:

- i. what performance measures are used; and
- ii. describe Defendant's bonus or incentive plan for adjusters.

XI.

CONCLUSION AND PRAYER

52. Plaintiffs pray that judgment be entered against Travelers Casualty Insurance Company of America, and that Plaintiffs be awarded all of its actual damages, consequential damages, prejudgment interest, additional statutory damages, post judgment interest, reasonable and necessary attorney fees, court costs and for all such other relief, general or specific, in law or in equity, whether pled or un-pled within this Original Petition.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs pray it be awarded all such relief to which it is due as a result of the acts of Travelers Casualty Insurance Company of America, and for all such other relief to which Plaintiffs may be justly entitled.

Respectfully submitted,

THE VOSS LAW FIRM, P.C.

/s/ Vincenzo J. Santini
Vincenzo J. Santini
Texas Bar No. 24064310
The Voss Law Center
26619 Interstate 45 South
The Woodlands, Texas 77380
Telephone: (713) 861-0015
Facsimile: (713) 861-0021
vince@vosslawfirm.com

And

/s/ Uriel Druker
Uriel Druker
Texas Bar No. 24044867
1119 Houston St.
Laredo, Texas 70840
Telephone: (956) 728-9191
uriel@drukerlawfirm.com

ATTORNEYS FOR PLAINTIFFS



State District Court
49TH Judicial District of Texas
Counties of Webb and Zapata

Jose A. Lopez
State District Judge

March 27, 2020

NOTICE OF CALENDAR CALL

CAUSE NO. 2020CVH000625D1

LAS PLAZAS OF SAUNDERS LTD; LAS PLAZAS OF LAREDO INC.

VS

TRAVELERS CASUALTY INSURANCE COMPANY OF AMERICA


Please take notice that this case is set for Calendar Call on 06/02/2020 at 1:30 PM at the 49th District Court, 3rd Floor, Webb County Justice Center.

All Calendar Call hearings will be in open Court and on the record before the Honorable Judge Jose A. Lopez. Your presence is **MANDATORY** unless Counsel for Plaintiff(s) and Defendant(s) have in place a pre-trial guideline order with both Counsel and Judge's signatures prior to calendar call date. This guideline order should have all appropriate dates including pre-trial, jury selection and all deadlines.

Counsel for Plaintiff(s) please note that if you do not appear for calendar call your case may be dismissed for lack of prosecution.

Counsel for Defendant(s) please note that if you do not appear for calendar call, a pre-trial guideline order may be entered with or without your approval and/or signature.

If there are any questions regarding this matter please feel free to call our office at any time.


Maria Rosario Ramirez
Civil Court Coordinator
49th District Court

Webb County • P.O. Box 6655 • Laredo, Texas 78042 • tel. 956.523.4237 • fax 956.523.5051
Zapata County • P.O. Box 789 • Zapata, Texas 78076 • tel. 956.765.9935 • fax 956.765.9789
49th_districtcourt@webbcountytx.gov

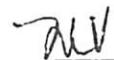


EXHIBIT “A-2”

CAUSE NO. 2020CVH000625D1

LAS PLAZAS OF SAUNDERS LTD,
LAS PLAZAS OF LAREDO INC.

Plaintiffs,

vs.

TRAVELERS CASUALTY INSURANCE
COMPANY OF AMERICA

Defendant.

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IN THE DISTRICT COURT

49TH JUDICIAL DISTRICT

WEBB COUNTY, TEXAS

DEFENDANT'S ORIGINAL ANSWER

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES TRAVELERS CASUALTY INSURANCE COMPANY OF AMERICA, Defendant in the above-entitled and numbered cause, and files this ORIGINAL ANSWER replying to PLAINTIFFS' ORIGINAL PETITION and for same says:

GENERAL DENIAL

Pursuant to Rule 92 of the Texas Rules of Civil Procedure, Defendant enters a general denial and demands that Plaintiffs prove their allegations by a preponderance of the evidence.

NOTICE OF CONSENT TO ELECTRONIC SERVICE

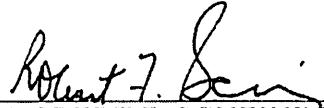
Defendant consents to electronic service of pleadings, motions, orders, notices, and discovery in this cause only when service is completed through eFileTexas.gov, the state-authorized electronic filing manager.

PRAYER

WHEREFORE, Defendant prays that Plaintiffs recover nothing from it by way of this suit; that Defendant recover costs of court, and for such other and further relief, both at law and in equity, to which this Defendant may be justly entitled.

Respectfully submitted,

BROCK ♦ GUERRA
STRANDMO DIMALINE JONES, P.C.
17339 Redland Road
San Antonio, Texas 78247-2304
(210) 979-0100 Telephone
(210) 979-7810 Facsimile

BY: 
ROBERT F. SCHEIHING
State Bar No. 17736350
Email: bscheihing@brock.law

ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing has been served in accordance with the Texas Rules of Civil Procedure on this 21 day of April, 2020, to:

Vincenzo J. Santini
The Voss Law Center
26619 Interstate 45 South
The Woodlands, Texas 77380

Fax No. 713/861-0021
Email: vince@vosslawfirm.com

Uriel Druker
Gonzalez Druker Law Firm
1119 Houston St.
Laredo, Texas 78040

Email: uriel@drukerlawfirm.com

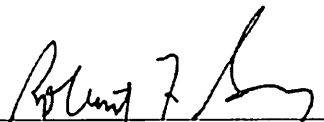

ROBERT F. SCHEIHING

EXHIBIT “A-3”

CAUSE NO. 2020CVH000625D1

LAS PLAZAS OF SAUNDERS LTD.
LAS PLAZAS OF LAREDO INC.

Plaintiffs.

vs.

TRAVELERS CASUALTY INSURANCE
COMPANY OF AMERICA

Defendant.

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IN THE DISTRICT COURT

49TH JUDICIAL DISTRICT

WEBB COUNTY, TEXAS

DEMAND FOR JURY

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES TRAVELERS CASUALTY INSURANCE COMPANY OF
AMERICA, Defendant in the above-entitled and numbered cause, and makes this DEMAND FOR
JURY TRIAL.

Respectfully submitted.

BROCK ♦ GUERRA
STRANDMO DIMALINE JONES, P.C.
17339 Redland Road
San Antonio, Texas 78247-2304
(210) 979-0100 Telephone
(210) 979-7810 Facsimile

BY:



ROBERT F. SCHEIHING
State Bar No. 17736350
Email: bscheihing@brock.law

ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing has been served in accordance with the Texas Rules of Civil Procedure on this 21 day of April, 2020, to:

Vincenzo J. Santini
The Voss Law Center
26619 Interstate 45 South
The Woodlands, Texas 77380

Fax No. 713/861-0021
Email: vince@vosslawfirm.com

Uriel Druker
Gonzalez Druker Law Firm
1119 Houston St.
Laredo, Texas 78040

Email: uriel@drukerlawfirm.com



ROBERT F. SCHEINING

EXHIBIT “A-4”

19804553-03

CAUSE NO. 2020CVH000625D1

LAS PLAZAS OF SAUNDERS LTD,
LAS PLAZAS OF LAREDO INC.

Plaintiffs,

vs.

TRAVELERS CASUALTY INSURANCE
COMPANY OF AMERICA

Defendant.

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IN THE DISTRICT COURT

49TH JUDICIAL DISTRICT

WEBB COUNTY, TEXAS

**DEFENDANT TRAVELERS CASUALTY INSURANCE COMPANY OF AMERICA'S
NOTICE OF FILING NOTICE OF REMOVAL**

TO THE HONORABLE JUDGE OF SAID COURT:

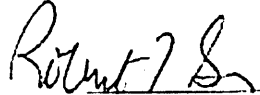
PLEASE TAKE NOTICE that on the 1st day of May, 2020, Defendant TRAVELERS CASUALTY INSURANCE COMPANY OF AMERICA, ("Travelers" or "Defendant"), filed with the clerk of the United States District Court for the Southern District of Texas, Laredo Division, its Notice of Removal, together with copies of all process, pleadings and orders served upon it in the action pending against it in the 49th Judicial District Court, Webb County, Texas captioned *Las Plazas of Saunders, Let. And Las Plazas of Laredo, Inc. v. Travelers Casualty Insurance Company of America*, Cause Number 2020CVH000625D1.

True and correct copies of the Notice of Removal and the Appendix Filed in Support of the Notice of Removal are attached hereto as Exhibit "A" and included herein by reference for all purposes.

All further proceedings with respect to this action shall take place before the United States District Court.

Respectfully submitted,

BROCK ♦ GUERRA
STRANDMO DIMALINE JONES, P.C.
17339 Redland Road
San Antonio, Texas 78247-2304
(210) 979-0100 Telephone
(210) 979-7810 Facsimile

BY: 
ROBERT F. SCHEIHING
State Bar No. 17736350
Email: bscheihing@brock.law

ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing has been served in accordance with the Texas Rules of Civil Procedure on this 1st day of May, 2020, to:

Vincenzo J. Santini
The Voss Law Center
26619 Interstate 45 South
The Woodlands, Texas 77380

Fax No. 713/861-0021
Email: vince@vosslawfirm.com

Uriel Druker
Gonzalez Druker Law Firm
1119 Houston St.
Laredo, Texas 78040

Email: uriel@drukerlawfirm.com


ROBERT F. SCHEIHING

EXHIBIT “B”

File # 8581210

FILED in the Office of the
Secretary of State of Texas

MAY 18 2009

**CERTIFICATE OF AMENDMENT
TO THE
CERTIFICATE OF LIMITED PARTNERSHIP**

Corporations Section

Pursuant to the provisions of Section 2.02 of the Texas Revised Partnership Act, the undersigned limited partnership desires to amend its certificate of limited partnership and for that purpose submits the following certificate of amendment

1 The name of the limited partnership is Frank Group Limited Partnership
(State the name of the limited partnership as currently shown in the records of the secretary of state. If the amendment changes the name of the partnership, state the old name and not the new name here.)

2. The certificate of limited partnership is amended as follows.

- 1) From: Frank Group Limited Partnership
To: Frank Group Properties Limited Partnership
- 2) General Partner from: Las Plazas of Saunders, Inc
to: Las Plazas of Laredo, Inc.
- 3) From: 503 Guadalupe St.
to: 901 Victoria Ste. B.

Viviana Frank
(Name of Limited Partnership)

By Viviana Frank
Its General Partner

Dated 5/15/09

Execution and Filing

The certificate of amendment should be signed by at least one general partner and by each other general partner designated in the certificate of amendment as a new general partner. The certificate of amendment need not be signed by a withdrawing general partner. Two copies of the certificate of amendment should be delivered to the secretary of state. The secretary of state will return a file stamped copy of the certificate of amendment along with a letter of acknowledgment, if a duplicate copy of the document was provided for such purpose.

Fee

The filing fee for certificate of amendment is \$150.00.

RECEIVED
SECRETARY OF STATE

MAY 18 2009

CLK 28
AUSTIN, TEXAS

LAS PLAZAS OF SAUNDERS, INC.
ARTICLES OF AMENDMENT TO
ARTICLES OF INCORPORATION

FILED
In the Office of the
Secretary of State of Texas
APR 25 1996
Corporations Section

Pursuant to the provisions of Article 4.04 of the Texas Business Corporations Act, the undersigned corporation adopts the following Articles of Amendment to its Articles of Incorporation:

ARTICLE ONE

The name of the corporation is Las Plazas of Saunders, Inc.

ARTICLE TWO

The following amendment to the Articles of Incorporation was adopted effective as of April 16, 1996:

Article I of the Articles of Incorporation of the Corporation shall be amended to read in its entirety as follows:

"ARTICLE I

The name of the corporation is Las Plazas of Laredo, Inc."

ARTICLE THREE

The number of shares of the corporation outstanding and entitled to vote at the time of such adoption was 1,000.

ARTICLE FOUR

The holder of all of the shares outstanding and entitled to vote on said amendment have signed a consent in writing adopting said amendment.

Dated: April 16, 1996.

LAS PLAZAS OF SAUNDERS, INC.

By: 

Matilde B. Frank, President

ARTICLES OF INCORPORATION

FILED
In the Office of the
Secretary of State of Texas

NOV 20 1992

Corporations Section

ARTICLE I

The name of the corporation is Las Plazas of Saunders, Inc.

ARTICLE II

The period of its duration is perpetual.

ARTICLE III

The purpose or purposes for which the corporation is organized is the transaction of any and all lawful business for which a corporation may be incorporated under the Texas Business Corporation Act.

ARTICLE IV

The aggregate number of shares which the corporation shall have authority to issue is Ten Thousand (10,000) Shares, \$1.00 par value. All such shares shall be of one class and shall be designated as Common Stock.

ARTICLE V

The corporation will not commence business until it has received for the issuance of shares consideration of the value of at least One Thousand Dollars (\$1,000.00) consisting of money, labor done or property actually received.

ARTICLE VI

The address of the principal office and the registered office of the corporation is 503 Guadalupe, Laredo, Texas 78040, and the registered agent at such address is Matilde Frank.

ARTICLE VII

The name and address of the sole shareholder of the corporation is:

Matilde Frank
503 Guadalupe
Laredo, Texas 78040

ARTICLE VIII

The number of directors constituting the initial board of directors of the corporation is one and the name and address of such person who is to serve as director until the first annual meeting of the shareholders or until her successor is elected and qualified is:

Matilde Frank
503 Guadalupe
Laredo, Texas 78040

ARTICLE IX

A director of the corporation shall not be liable to the corporation or its shareholders for monetary damages for an act or omission in the director's capacity as a director, except that this provision does not eliminate or limit the liability of a director to the extent the director is found liable for:

- (i) a breach of the director's duty of loyalty to the corporation or its shareholders;
- (ii) an act or omission not in good faith that constitutes a breach of duty of the director to the corporation or an act or omission that involves intentional misconduct or a knowing violation of the law;
- (iii) a transaction from which the director received an improper benefit, whether or not the benefit resulted from an action taken within the scope of the director's office; or
- (iv) an act or omission for which the liability of the director is explicitly provided by an applicable statute.

Any amendment, repeal or modification of the foregoing provision by the shareholders of the corporation shall not adversely affect any limitation on the liability of any director of the corporation existing at or prior to the time of such amendment, repeal or modification.

ARTICLE X

An action required or permitted to be taken at any annual or special meeting of shareholders may be taken without a meeting, without prior notice, and without a vote, if a consent or consents in writing, setting forth the action so taken, shall be signed by the holder or holders of shares having not less than the minimum number of votes that would be necessary to take such action at a meeting at which the holders of all shares entitled to vote on the action were present and voted.

ARTICLE XI

The name and address of the incorporator is:

**Carolyn M. Beckett
Jenkins & Gilchrist,
a Professional Corporation
2200 One American Center
600 Congress Avenue
Austin, Texas 78701**

INCORPORATOR:



CAROLYN M. BECKETT

EXHIBIT “C”

05-102
(Rev.9-15/33)**Texas Franchise Tax Public Information Report**To be filed by Corporations, Limited Liability Companies (LLC), Limited Partnerships (LP),
Professional Associations (PA) and Financial Institutions

■ Tcode 13196 Franchise

■ Taxpayer number

3 0 1 1 6 0 6 5 8 9 4

■ Report year

2 0 1 9

You have certain rights under Chapter 552 and 559,
Government Code, to review, request and correct information
we have on file about you. Contact us at 1-800-252-1381.

Taxpayer name LAS PLAZAS OF LAREDO, INC.		<input type="checkbox"/> Blacken circle if the mailing address has changed.	
Mailing address 901 VICTORIA ST SUITE B		Secretary of State (SOS) file number or Comptroller file number	
City LAREDO	State TX	ZIP code plus 4 78040	0125094200

☐ Blacken circle if there are currently no changes from previous year; if no information is displayed, complete the applicable information in Sections A, B and C.

Principal office 901 VICTORIA ST SUITE B, LAREDO, TX, 78040
Principal place of business 901 VICTORIA ST SUITE B, LAREDO, TX, 78040

You must report officer, director, member, general partner and manager information as of the date you complete this report.



1000000000015

Please sign below! This report must be signed to satisfy franchise tax requirements.**SECTION A** Name, title and mailing address of each officer, director, member, general partner or manager.

Name JULIAN ROTNOFSKY	Title DIRECTOR	Director <input checked="" type="radio"/> YES	Term expiration m m d d y y <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>
Mailing address PO BOX 511	City LAREDO	State TX	ZIP Code 78042
Name	Title	Director <input type="radio"/> YES	Term expiration m m d d y y <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>
Mailing address	City	State	ZIP Code
Name	Title	Director <input type="radio"/> YES	Term expiration m m d d y y <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>
Mailing address	City	State	ZIP Code

SECTION B Enter information for each corporation, LLC, LP, PA or financial institution, if any, in which this entity owns an interest of 10 percent or more.

Name of owned (subsidiary) corporation, LLC, LP, PA or financial institution	State of formation	Texas SOS file number, if any	Percentage of ownership
Name of owned (subsidiary) corporation, LLC, LP, PA or financial institution	State of formation	Texas SOS file number, if any	Percentage of ownership

SECTION C Enter information for each corporation, LLC, LP, PA or financial institution, if any, that owns an interest of 10 percent or more in this entity.

Name of owned (parent) corporation, LLC, LP, PA or financial institution	State of formation	Texas SOS file number, if any	Percentage of ownership
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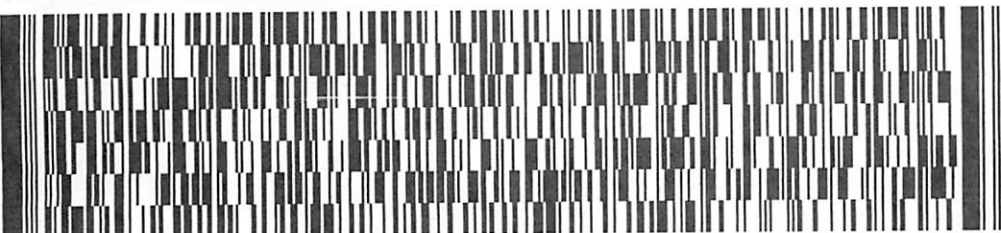
Registered agent and registered office currently on file (see instructions if you need to make changes)

Agent: **URIEL DRUKER ATTORNEY AT LAW**You must make a filing with the Secretary of State to change registered
agent, registered office or general partner information.

Office: 901 VICTORIA ST APT B	City LAREDO	State TX	ZIP Code 78040
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The information on this form is required by Section 171.203 of the Tax Code for each corporation, LLC, LP, PA or financial institution that files a Texas Franchise Tax Report. Use additional
sheets for Sections A, B and C, if necessary. The information will be available for public inspection.I declare that the information in this document and any attachments is true and correct to the best of my knowledge and belief, as of the date below, and that a copy of this report has
been mailed to each person named in this report who is an officer, director, member, general partner or manager and who is not currently employed by this or a related corporation,
LLC, LP, PA or financial institution.

sign here JULIAN ROTNOFSKY	Title PRESIDENT	Date 04/02/2019	Area code and phone number (512) 327 - 9811
--------------------------------------	---------------------------	---------------------------	---

Texas Comptroller Official Use Only

VE/DE <input type="radio"/>	PIR IND <input type="radio"/>
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EXHIBIT “D”

TEXAS SECRETARY of STATE
RUTH R. HUGHS**BUSINESS ORGANIZATIONS INQUIRY - VIEW ENTITY**

Filing Number: 8851810
Original Date of Filing: April 25, 1996
Formation Date: N/A
Tax ID: 17426550517
Duration: Perpetual
Entity Type: Domestic Limited Partnership (LP)
Entity Status: In existence
FEIN:
Name: LAS PLAZAS OF SAUNDERS, LTD.
Address: 901 Victoria Ste B
Laredo, TX 78040 USA

<u>REGISTERED AGENT</u>	<u>FILING HISTORY</u>	<u>NAMES</u>	<u>MANAGEMENT</u>	<u>ASSUMED NAMES</u>	<u>ASSOCIATED ENTITIES</u>
Last Update July 19, 2012	Name LAS PLAZAS OF LAREDO, INC.	Title General Partner	Address 901 Victoria Ste B Laredo, TX 78040 USA		

[Order](#) [Return to Search](#)

Instructions:

- To place an order for additional information about a filing press the 'Order' button.

EXHIBIT “E”

05-102
(Rev. 9-15/33)**Texas Franchise Tax Public Information Report**To be filed by Corporations, Limited Liability Companies (LLC), Limited Partnerships (LP),
Professional Associations (PA) and Financial Institutions

■ Tcode 13196 Franchise

■ Taxpayer number

1 7 4 2 6 5 5 0 5 1 7

■ Report year

2 0 1 9

You have certain rights under Chapter 552 and 559,
Government Code, to review, request and correct information
we have on file about you. Contact us at 1-800-252-1381.

Taxpayer name LAS PLAZAS OF SAUNDERS, LTD.		<input type="radio"/> Blacken circle if the mailing address has changed.	
Mailing address 901 VICTORIA ST SUITE B		Secretary of State (SOS) file number or Comptroller file number 0008851810	
City LAREDO	State TX	ZIP code plus 4 78040	

☐ Blacken circle if there are currently no changes from previous year; if no information is displayed, complete the applicable information in Sections A, B and C.

Principal office PO BOX 511, LAREDO, TX, 78042
Principal place of business PO BOX 511, LAREDO, TX, 78042

You must report officer, director, member, general partner and manager information as of the date you complete this report.



1000000000015

Please sign below! This report must be signed to satisfy franchise tax requirements.**SECTION A** Name, title and mailing address of each officer, director, member, general partner or manager.

Name LAS PLAZAS OF LAREDO INC	Title PARTNER	Director <input type="radio"/> YES	Term expiration m m d d y y [][][][][][]
Mailing address PO BOX 511	City LAREDO	State TX	ZIP Code 78042
Name ANNA FRANK	Title PARTNER	Director <input type="radio"/> YES	Term expiration m m d d y y [][][][][][]
Mailing address PO BOX 511	City LAREDO	State TX	ZIP Code 78042
Name LINDA FRANK DRUCKER	Title PARTNER	Director <input type="radio"/> YES	Term expiration m m d d y y [][][][][][]
Mailing address PO BOX 511	City LAREDO	State TX	ZIP Code 78042

SECTION B Enter information for each corporation, LLC, LP, PA or financial institution, if any, in which this entity owns an interest of 10 percent or more.

Name of owned (subsidiary) corporation, LLC, LP, PA or financial institution	State of formation	Texas SOS file number, if any	Percentage of ownership
Name of owned (subsidiary) corporation, LLC, LP, PA or financial institution	State of formation	Texas SOS file number, if any	Percentage of ownership

SECTION C Enter information for each corporation, LLC, LP, PA or financial institution, if any, that owns an interest of 10 percent or more in this entity.

Name of owned (parent) corporation, LLC, LP, PA or financial institution	State of formation	Texas SOS file number, if any	Percentage of ownership
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Registered agent and registered office currently on file (see instructions if you need to make changes)
Agent: **URIEL DRUKER ATTORNEY AT LAW**

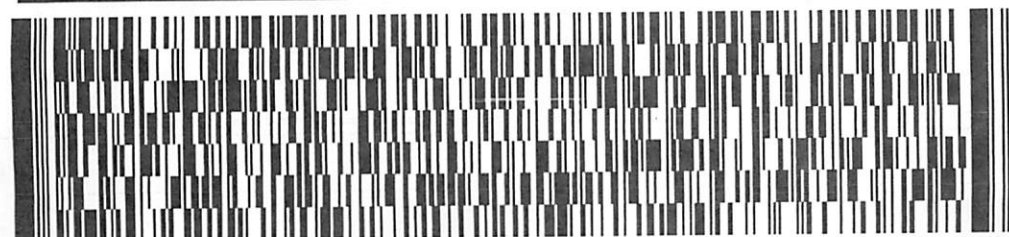
You must make a filing with the Secretary of State to change registered agent, registered office or general partner information.

Office: 1618 CHIHUAUA ST	City LAREDO	State TX	ZIP Code 78043
---------------------------------	-----------------------	--------------------	--------------------------

The information on this form is required by Section 171.203 of the Tax Code for each corporation, LLC, LP, PA or financial institution that files a Texas Franchise Tax Report. Use additional sheets for Sections A, B and C, if necessary. The information will be available for public inspection.

I declare that the information in this document and any attachments is true and correct to the best of my knowledge and belief, as of the date below, and that a copy of this report has been mailed to each person named in this report who is an officer, director, member, general partner or manager and who is not currently employed by this or a related corporation, LLC, LP, PA or financial institution.

sign here VIVIANA FRANK	Title PRESIDENT	Date 02/21/2019	Area code and phone number (956) 795 - 0874
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Texas Comptroller Official Use Only

VE/DE <input type="radio"/>	PIR IND <input type="radio"/>
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05-102
(Rev.9-15/33)**Texas Franchise Tax Public Information Report**To be filed by Corporations, Limited Liability Companies (LLC), Limited Partnerships (LP),
Professional Associations (PA) and Financial Institutions

■ Tcode 13196 Franchise

■ Taxpayer number

1 7 4 2 6 5 5 0 5 1 7

■ Report year

2 0 1 9

You have certain rights under Chapter 552 and 559,
Government Code, to review, request and correct information
we have on file about you. Contact us at 1-800-252-1381.

Taxpayer name LAS PLAZAS OF SAUNDERS, LTD.		<input type="checkbox"/> Blacken circle if the mailing address has changed.	
Mailing address 901 VICTORIA ST SUITE B		Secretary of State (SOS) file number or Comptroller file number 0008851810	
City LAREDO	State TX	ZIP code plus 4 78040	

☐ Blacken circle if there are currently no changes from previous year; if no information is displayed, complete the applicable information in Sections A, B and C.

Principal office PO BOX 511, LAREDO, TX, 78042
Principal place of business PO BOX 511, LAREDO, TX, 78042

You must report officer, director, member, general partner and manager information as of the date you complete this report.



1000000000015

Please sign below! This report must be signed to satisfy franchise tax requirements.**SECTION A** Name, title and mailing address of each officer, director, member, general partner or manager.

Name JACQUELINE FRANK ESTATE	Title PARTNER	Director <input type="radio"/> YES	Term expiration m m d d y y [][][][][][]
Mailing address PO BOX 511	City LAREDO	State TX	ZIP Code 78042
Name URIEL DRUKER	Title SECRETARY	Director <input type="radio"/> YES	Term expiration m m d d y y [][][][][][]
Mailing address PO BOX 511	City LAREDO	State TX	ZIP Code 78042
Name JULIAN ROTNOFSKY	Title DIRECTOR	Director <input checked="" type="radio"/> YES	Term expiration m m d d y y [][][][][][]
Mailing address PO BOX 511	City LAREDO	State TX	ZIP Code 78042

SECTION B Enter information for each corporation, LLC, LP, PA or financial institution, if any, in which this entity owns an interest of 10 percent or more.

Name of owned (subsidiary) corporation, LLC, LP, PA or financial institution	State of formation	Texas SOS file number, if any	Percentage of ownership
Name of owned (subsidiary) corporation, LLC, LP, PA or financial institution	State of formation	Texas SOS file number, if any	Percentage of ownership

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Name of owned (parent) corporation, LLC, LP, PA or financial institution	State of formation	Texas SOS file number, if any	Percentage of ownership
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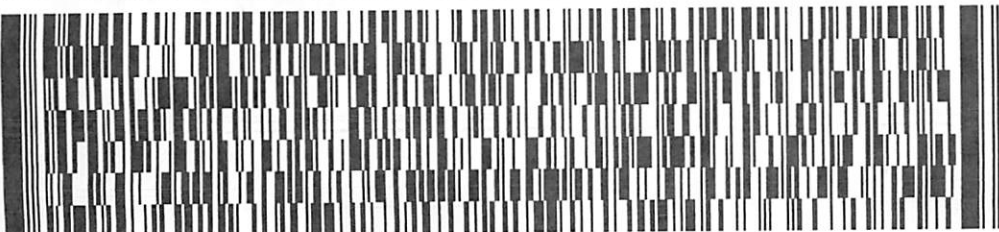
Registered agent and registered office currently on file (see instructions if you need to make changes)

Agent: **URIEL DRUKER ATTORNEY AT LAW**You must make a filing with the Secretary of State to change registered
agent, registered office or general partner information.

Office: 1618 CHIHUAUA ST	City LAREDO	State TX	ZIP Code 78043
---------------------------------	-----------------------	--------------------	--------------------------

The information on this form is required by Section 171.203 of the Tax Code for each corporation, LLC, LP, PA or financial institution that files a Texas Franchise Tax Report. Use additional
sheets for Sections A, B and C, if necessary. The information will be available for public inspection.I declare that the information in this document and any attachments is true and correct to the best of my knowledge and belief, as of the date below, and that a copy of this report has
been mailed to each person named in this report who is an officer, director, member, general partner or manager and who is not currently employed by this or a related corporation,
LLC, LP, PA or financial institution.

sign here VIVIANA FRANK	Title PRESIDENT	Date 02/21/2019	Area code and phone number (956) 795 - 0874
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Texas Comptroller Official Use Only

VE/DE <input type="radio"/>	PIR IND <input type="radio"/>
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Comptroller
of Public
Accounts
FORM05-102
(Rev.9-15/33)**Texas Franchise Tax Public Information Report**To be filed by Corporations, Limited Liability Companies (LLC), Limited Partnerships (LP),
Professional Associations (PA) and Financial Institutions

■ Tcode 13196 Franchise

■ Taxpayer number

1 7 4 2 6 5 5 0 5 1 7

■ Report year

2 0 1 9

You have certain rights under Chapter 552 and 559,
Government Code, to review, request and correct information
we have on file about you. Contact us at 1-800-252-1381.

Taxpayer name LAS PLAZAS OF SAUNDERS, LTD.			<input type="radio"/> Blacken circle if the mailing address has changed.		
Mailing address 901 VICTORIA ST SUITE B			Secretary of State (SOS) file number or Comptroller file number		
City LAREDO	State TX	ZIP code plus 4 78040	0008851810		

☐ Blacken circle if there are currently no changes from previous year; if no information is displayed, complete the applicable information in Sections A, B and C.

Principal office PO BOX 511, LAREDO, TX, 78042
Principal place of business PO BOX 511, LAREDO, TX, 78042

You must report officer, director, member, general partner and manager information as of the date you complete this report.



1000000000015

Please sign below! This report must be signed to satisfy franchise tax requirements.**SECTION A** Name, title and mailing address of each officer, director, member, general partner or manager.

Name VIVIANA FRANK	Title PRESIDENT	Director <input type="radio"/> YES	Term expiration	m	m	d	d	y	y
Mailing address PO BOX 511	City LAREDO	State TX	ZIP Code 78042						
Name JACQUELINE FRANK ESTATE	Title	Director <input type="radio"/> YES	Term expiration	m	m	d	d	y	y
Mailing address PO BOX 511	City LAREDO	State TX	ZIP Code 78042						
Name	Title	Director <input type="radio"/> YES	Term expiration	m	m	d	d	y	y
Mailing address	City	State	ZIP Code						

SECTION B Enter information for each corporation, LLC, LP, PA or financial institution, if any, in which this entity owns an interest of 10 percent or more.

Name of owned (subsidiary) corporation, LLC, LP, PA or financial institution	State of formation	Texas SOS file number, if any	Percentage of ownership
Name of owned (subsidiary) corporation, LLC, LP, PA or financial institution	State of formation	Texas SOS file number, if any	Percentage of ownership

SECTION C Enter information for each corporation, LLC, LP, PA or financial institution, if any, that owns an interest of 10 percent or more in this entity.

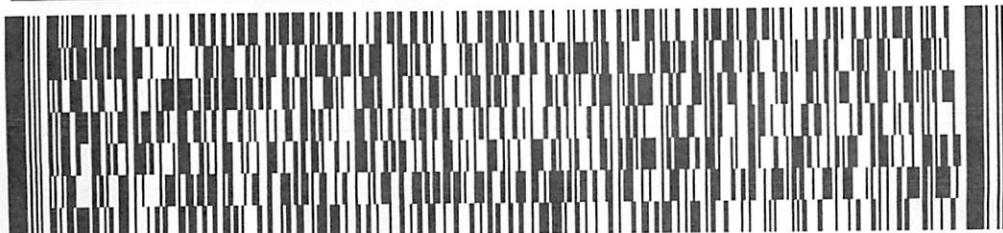
Name of owned (parent) corporation, LLC, LP, PA or financial institution	State of formation	Texas SOS file number, if any	Percentage of ownership
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Registered agent and registered office currently on file (see instructions if you need to make changes)		You must make a filing with the Secretary of State to change registered agent, registered office or general partner information.	
Agent: URIEL DRUKER ATTORNEY AT LAW			
Office: 1618 CHIHUAUA ST	City: LAREDO	State: TX	ZIP Code: 78043

The information on this form is required by Section 171.203 of the Tax Code for each corporation, LLC, LP, PA or financial institution that files a Texas Franchise Tax Report. Use additional sheets for Sections A, B and C, if necessary. The information will be available for public inspection.

I declare that the information in this document and any attachments is true and correct to the best of my knowledge and belief, as of the date below, and that a copy of this report has been mailed to each person named in this report who is an officer, director, member, general partner or manager and who is not currently employed by this or a related corporation, LLC, LP, PA or financial institution.

sign here VIVIANA FRANK	Title PRESIDENT	Date 02/21/2019	Area code and phone number (956) 795 - 0874
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EXHIBIT “F”



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Jaqueline Frank-Geissler | 1949 - 2014 | Obituary



Jaqueline Frank-Geissler

November 01, 1949 - November 11, 2014

ry%20for%20Jaqueline%20%20Frank-

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Jaqueline Frank-Geissler

Mrs. Jaqueline Frank-Geissler, 65, departed this life on November 11, 2014 in Dallas, Texas.

Born November 1, 1949 in Laredo, Texas, Jaqueline Frank-Geissler moved to New York City after high school where she met the love of her life, Richard Geissler. Jaque worked as a realtor most of her life but her passions and talents were her family, photography, and art.

Jaque is preceded in death by her son, Matthew Geissler; and her mother and father, Adela and Mauricio

Frank.

She is survived by her husband, Richard Geissler; her children, Sean (Gracie), Genine, Jacob (Ruth), Jason and Rebecca; 8 grandchildren; 1 great-grandchild; and her sisters Anna, Linda and Viviana.

Visitation will be held on Thursday, November 13, 2014 from 9:00 a.m. to 11:00 a.m. in the Hillside Funeral Home Chapel. A service will begin at 11:00 a.m.

Interment will follow at the Jewish Rest Cemetery in the City of Laredo Cemetery.

If you would like to sign the guestbook or send private condolences, you may do so at www.hillsidefuneral.com.

Arrangements are under the direction of Hillside Funeral Home, 310 Hillside Road.

[Print Obituary \(/obituaries/print?o_id=2802288\)](#)

Sign Guestbook

Name: *

Name (required)

Location:

Location

Video:

Link to Video (Youtube or Vimeo)

Image:

No file chosen

Light A Candle



Candle 1



Candle 2



Candle 3



Candle 4

Email: *

Email (required)

☐ Please keep my message private

Personal Message: *

Personal Message (required)

Confirm: *

☐ I'm not a robot

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✉ info@hillsidefuneral.com (mailto:info@hillsidefuneral.com)

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